

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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**MARK A. FAVORS, HOWARD LEIB, LILLIE  
H. GALAM, EDWARD A. MULRAINE,  
WARREN SCHREIBER, and WEYMAN A.  
CAREY,**

**Plaintiffs,**

**DONNA K. KAYE, EDWIN ELLIS, AIDA  
FORREST, GENE A. JOHNSON, JOY WOOLLEY,  
SHEILA WRIGHT, LINDA LEE, SHING CHOR  
CHUNG, JULIA YANG, JUNG HO HONG, JUAN  
RAMOS, NICK CHAVARRIA, GRACIELA  
HEYMAN, SANDRA MARTINEZ, EDWIN  
ROLDAN, MANOLIN TIRADO, LINDA ROSE,  
EVERET THOMPSON-WEREKOH, CARLOTTA  
BISHOP, CAROL RINZLER, GEORGE  
STAMATIADES, JOSEPHINE RODRIGUEZ,  
SCOTT AUSTER, EDWIN  
FIGUEROA, and SANTIAGO DIAZ ,**

**Intervenor – Plaintiffs,**

**-against-**

**ANDREW CUOMO, as Governor of the State  
of New York, DEAN G. SKELOS, as Majority  
Leader and President Pro Tempore of the Senate  
of the State of New York, SHELDON SILVER,  
as Speaker of the Assembly of the State of New  
York, ANDREA STWEART-COUSINS, as  
Minority Leader of the Senate of the State of  
New York, BRIAN M. KOLB, as  
Minority Leader of the Assembly of the State  
of New York, the NEW YORK LEGISLATIVE  
TASK FORCE ON DEMOGRAPHIC RESEARCH  
AND REAPPORTIONMENT (“LATFOR”), JOHN  
J. McENENY, as a Member of LATFOR, ROMAN  
HEDGES, as member of LATFOR, MARTIN  
MALAVE DILAN, as Member of LATFOR, as  
Member of LATOR, and WELQUIS R. LOPEZ,  
as a member of LATFOR,**

**Defendants.**

**DECLARATION OF  
ZULEMA BLAIR, PhD  
Docket No. 11-cv-5632  
(RR) (GEL) (DLI) (RLM)**

STATE OF NEW YORK)

)ss:

KINGS COUNTY )

**ZULEMA BLAIR**, being duly sworn deposes and say::

1. My name is Zulema Blair, PhD. I am one of Plaintiffs-Intervenors' consultant experts in the instant case.

2. I am an Adjunct Assistant Professor of Political Science at John Jay College of Criminal Justice of the City University of New York (CUNY) in New York, New York. Prior to joining the faculty of John Jay, I served as Chair of the Department of Public Administration at Medgar Evers College, where I was employed as a faculty member for six years.

3, While at Medgar Evers College, I also served as the Director of the Census Information Center (CIC) which was a partnership/network of 54 non-profit national and community based organizations, colleges, chambers of commerce and civil rights organizations that provided local access, education, and technical assistance on census data for planning and decision-making to underserved communities. In addition, I served on the CIC's National Steering Committee from 2007 – 2010.

4. I received my Bachelor of Arts from Boston College in 1995, my Master of Public Administration from the State University at Binghamton in 1998, and a PhD in Political Science from the State University at Binghamton in 2002. My areas of expertise include low-income populations, voter turnout, urban and racial politics, research methodology, and quantitative analysis.

5. I was the recipient of the Clifford D. Clarke Fellowship from 1998 – 2002, when I wrote my dissertation entitled *Participation at the Margins: Is it Race or Class?* which was

recently published as a manuscript by Lambert Academic Publishing. This book provides details on the different theories of voter turnout and finds that race is the most significant indicator in why people turn out to vote.

6. I am also the author of a two book chapters (one in print and one forthcoming), a forthcoming article in the *Ralph Bunche Journal of Public Affairs*, and a co-author of a research study "Census Demographic Research Study: "Where Have All the Blacks Gone?"

7. I have also published a book chapter, "Buffalo, New York: An Analysis of Byron Brown's Universal Approach to Leadership," in *21<sup>st</sup> Century Urban Race Politics: Representing Minorities as Universal Interests*, and have an article "What We Should Have Known About the Black Vote: A Comprehensive Analysis of Voter Turnout in Presidential Elections," as well as an additional book chapter, accepted for publication. A true and correct copy of my resume is attached hereto as an Exhibit A.

8. I was retained by Plaintiffs-Intervenor to assist in the analysis of racially polarized voting, Black voter opportunities in congressional districts within New York City, and the development of the Black majority-minority districts for the Unity Map.

9. The Unity Map was created as a result of a series of meetings and discussions with community-based organizations, other civil rights groups such as Latino Justice/PRLDF, the National Latino Policy Institute, and the Asian American legal Defense Fund. Most of the congressional districts contained in the Unity Map were adopted by the three-judge panel in March 2012 in time for the process to begin petitioning for the 2012 congressional primary elections.

10. My time records are attached hereto as Exhibit B. I devoted a total of 19 hours to this matter. Plaintiff-Intervenors have requested that I be paid at an hourly rate of \$100.00. This

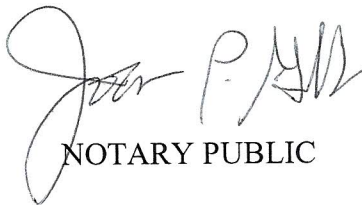
hourly rate is reasonable in of my skills, expertise and reputation. Accordingly, I respectfully request compensation in the amount of \$1,900 for the 19 hours that have I devoted to this matter.

Dated: Brooklyn, New York  
December 19, 2013

Respectfully submitted,



SWORN TO BEFORE ME THIS 19<sup>TH</sup>  
DAY OF DECEMEBER 2013



NOTARY PUBLIC

**JOAN P. GIBBS**  
**Notary Public, State of New York**  
**No. 02GI6220490**  
**Qualified in Kings County**  
**Commission Expires April 12, 2014**

# EXHIBIT A



**ZULEMA BLAIR**

149 Sterling Street, 3C, Brooklyn, NY 11225

Phone: (718)724-9916; Email: [zulemablair@yahoo.com](mailto:zulemablair@yahoo.com)

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**Education**

PhD. Department of Political Science, Binghamton University (SUNY), May 2002

MPA, Department of Political Science, Binghamton University (SUNY), May 1998

BA, Political Science, Boston College, May 1995

**Research Interests – Low Income Populations and Political Participation**

**Teaching Interests** – American Government, Political Behavior, Public Policy, Race, Class, and Ethnic Politics, Urban Politics, Research Methodology, Public Administration, Program Evaluation, Organization Theory

**Faculty Appointments**

2011 – Present: Adjunct Assistant Professor, Department of Political Science, John Jay College of Criminal Justice, CUNY

2006 – 2011: Department Chair

- Development and implementation of new strategic plan for department
- Recruitment and Retention – increased FTE by more than 50% via better mentoring, advisement, and more expansive and consistent course offerings. Also, as a result of a strategy to market to first-time freshmen in the college of freshman studies and working with enrollment management to develop an executive management plan, enrollment has increased by more than 50%.
- Graduation – Increased graduation rates at a time when the college was experiencing a decrease in graduation
- Curriculum Development – complete overhaul of curriculum and restructuring of both Associates and Bachelors degree programs; developed new courses to increase course offerings in both AS and BS programs and to better align department in the School of Business; revised existing courses to remove unnecessary pre-requisites and subsequently any roadblocks toward degree; increased use of technology in the classroom; modified curriculum that allowed for easy transition into graduate MPA programs

- Graduate and Law Schools – created and established pre-law program as well as an undergraduate research initiative that allowed for an increase in the number of students entering into graduate and law school programs
- Collaborative Approach – established a strong and inter-disciplinary framework across various academic departments and schools to offer more diverse programs of study
- Increase CUNY Proficiency Examination show and pass rates by more than 60%
- Mentoring – competitive internships; increased acceptance rates for graduate and professional schools; undergraduate research via student presentations at conferences
- Developed partnerships with governmental agencies and non-profit organizations to provide mentorships, internships, and scholarship opportunities for students
- Experiential Learning – Increased opportunities for students to participate in long-term internships in administrative cities such as Albany, NY and Washington, D.C which transferred into gainful employment upon graduation
- Established Brown Bag Luncheons to promote more faculty research and scholarship
- Developed certificate programs in the School of Professional and Community Development that aligned with degree programs

2005 – 2011: Assistant Professor, Department of Public Administration, Medgar Evers College, CUNY

**Courses Taught:** Organization Theory, Research Methods and Statistics, Public Policy and Analysis, Introductory and Capstone Courses in Public Administration, Internship Coordinator, Program Evaluation, and E-Government

### **Publications**

Blair, Zulema. April 24, 2013. “Buffalo, New York: An Analysis of Byron Brown’s Universal Approach to Leadership”, *21<sup>st</sup> Century Urban Race Politics: Representing Minorities as Universal Interests*, ed. Ravi K. Perry.

Blair, Zulema. 2012. *Participation at the Margins: Is it Race or Class*. Lambert Academic Publishing.

Blair, Zulema. “Political Engagement Begins in the Classroom”. Political Engagement Project (PEP) Newsletter, March 26, 2008: Part 1, pp. 3 – 4. (non peer-reviewed)

### **Forthcoming Publications**

Blair, Zulema. “Civic Engagement is a Process: Lessons Learned From A First-Year Public Administration Course”, *Expected Year of Publication: 2014*

Blair, Zulema. “What We Should Have Known About the Black Vote: A Comprehensive Analysis of Voter Turnout in Presidential Elections”. *Ralph Bunche Journal of Public Affairs*. *Expected Year of Publication: 2014*

Blair, Zulema. "Globalization and Low-Income Populations in the United States: Political Participation and Nonparticipation of an Apolitical Group" in *Between U.S. Neo-Liberal Hegemony and the New Empire: Global Africa Challenges to Globalization*, ed. Darryl C. Thomas (Michigan State University Press. *Expected Year of Publication: 2013*

### **Research Study**

Blair, Zulema. 2012 – 13. Expert Declaration in *Favors versus Cuomo* Redistricting Court Case.

Lewis, Frank, Blair, Zulema, and Edwin Dei. 2010. "Census Demographic Research Study: Where Have All the Blacks Gone?"

### **Grants**

- Sub-grantee for *New York State Census Complete Count Committee Grant* from NYS Office of the Governor, Spring 2010
- *Best Practices for Producing Civic Responsibility in New York City Housing Authority (NYCHA)* from the Independence Community Foundation (\$100,000) for Black Male Initiative, Spring 2007

### **Conference Presentations (Last Five Years)**

Panelist: "Developing Undergraduate Public Administration Programs," Annual National Association of Schools of Public Affairs and Administration, September 2010.

Panelist: "Black Leadership in the Twenty-First Century," Midwest Political Science Association, April, 2010.

Panelist: "Public Administration: The impact on Undergraduate Students," Midwest Political Science Association, April, 2010.

Panelist: "Creating A Day of Service," the American Democracy Project National Meeting, Baltimore, MD, June, 2009.

Panelist: "Sustaining a Community: The road to Volunteerism, Organizational Involvement and Civic Engagement in Communities of Color," the American Democracy Project National Meeting, Snowbird, UT, June, 2008.

Guest Speaker: "Why Black Women Should Vote For Obama," Vanguard Independent Democratic Association, 2008.



Moderator: Voter Assistance Commission's Justice Symposium. A collaboration between the Department of Public Administration, the Brennan Center for Justice at New York University Law School, Hon. Cheryl Chambers, Supreme Court Justice, Center for NuLeadership on Urban Solutions of the DuBois Bunche Center for Economic and Public Policy, Office of the Deputy Mayor for Education and Community Development, and HIRE Network Legal Action Center, 2007.

Roundtable Panelist: "Miscalculations: An Analysis of the 11<sup>th</sup> Congressional District," Hostos Community College, CUNY, 2007..

Roundtable Panelist: Voter Assistance Commission Service Learning Project  
A collaboration between the Department of Public Administration, Medgar Evers College, CUNY and Manning Marable's, Institute for Research in African American Studies at Columbia University on "The Importance of Voter Registration," September, 2005.

### **Significant Service to the College/University**

2011	Vice Chair, College-wide Curriculum Committee
2009	Faculty Representative, Presidential Search Committee
2009	Department Representative, Honors Committee
2009 – 11	Faculty Representative, Committee on Committees
2007 – 11	Member, Re-accreditation for the School of Business
2006 – 11	Department Representative, College-wide Personnel and Budget Committee
2006 – 11	Department Representative, Academic Council,
2006 – 11	Department Representative, College Council
2006 – 10	Coordinated Undergraduate Education
2006	Member, Middle States Re-accreditation Team

### **Fellowships and Awards**

2008	Central Brooklyn Anti-Violence Coalition Education Award
2008	Proclamation from Congresswoman Yvette Clark
2008	The Council of the City of New York Proclamation
2008	New York State Assembly Proclamation
2008	Kings County District Attorney Proclamation
2007	Ella McQueen Scholarship Award
2007	The Council of the City of New York Proclamation
2007	New York State Assembly Proclamation

### **Public Service**

- Member of National Steering Committee for Census Information Center (CIC)  
President, Black Brooklyn Empowerment Coalition – an umbrella organization for community organizing

- Board Member, Needle Exchange Program Reviewer, *Journal of Politics*

#### **Professional Memberships**

American Political Science Association,  
Midwest Political Science Association  
Southern Political Science Association  
National Conference of Black Political Scientists  
Western Political Science Association  
National Association of Schools of Public Affairs and Administration

#### **Other Appointments and Accomplishments**

*MEC Campus Coordinator, 2006 - 9*

**American Democracy Project's Political Engagement Project, AASCU**

*President, 2006 – 9*

**Black Brooklyn Empowerment Coalition**

*Director, 2006 – 11*

**Census Information Center**

*Deputy Director, 2006 - 8*

**DuBois Bunche Center for *Economic* and Public Policy, Medgar Evers College, CUNY**

*Research Associate, 2005 - 6*

**DuBois Bunche Center for *Economic* and Public Policy, Medgar Evers College, CUNY**

*Post-Doctoral Fellowship, 2004 – 5*

**Crown Heights Youth Collective**

#### **References**

Dr. Evelyn Castro  
Associate Dean, Medgar Evers College  
1650 Bedford Avenue  
Brooklyn, NY 11225

Esmeralda Simmons, ESQ.  
Executive Director, Center for Law and Social Justice (CLSJ)  
Medgar Evers College  
1650 Bedford Avenue  
Brooklyn, NY 11225  
[eslyjj@aol.com](mailto:eslyjj@aol.com)

Dr. Ric Curtis  
Professor, Department of Anthropology  
John Jay College of Criminal Justice, CUNY

9173272828

[rcurtis@jjay.cuny.edu](mailto:rcurtis@jjay.cuny.edu)

# EXHIBIT B

Zulema Blair  
Favors v. Cuomo  
Time Records

Date	Activity	Time
11/01/2011	Meeting with Esmeralda Simmons re: redistricting work and assignments	1.00
12/5/2011	Black NYers for Fair Redistricting Meeting: re Congressional districts	2.00
12/15/2011	Conference call with Plaintiffs-Intervenors counsel, experts re: congressional districts	1.00
1/27/2012	Meeting with counsel for Drayton, Ramos and Lee plaintiffs-intervenors, and experts re: congressional districts; Unity Map	2.00
2/10/2012	Meeting with counsel for Drayton, Ramos and Lee plaintiffs-intervenors, and experts re: congressional districts; Unity Map	2.00
2/23/23	Meeting with counsel for Drayton, Ramos and Lee plaintiffs-intervenors, and experts re: congressional districts; Unity Map	2.00
2/29/12	Conference call with Plaintiffs-Intervenors counsel, and experts re: congressional districts	1.00
2/29/2012	Meeting with Esmeralda Simmons and Frank Lewis re: analysis of alternative congressional plans	1.00
3/7/2012	Conference call with Plaintiffs-Intervenors counsel, and experts re: congressional districts	1.00
3/13/2012	Reviewing Judge Mann's proposed congressional maps with Plaintiffs-Intervenors counsel, and experts	5.00



3/16/2012

Conference with Plaintiffs-Intervenors counsel, and  
and experts re: congressional districts

1.00

**TOTAL**

**19 HOURS**